

GEKP

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

RICHARD BOYLE

CRIMINAL NO:

DATE FILED:

VIOLATIONS:

18 U.S.C. § 2113(a) (bank robbery -

11 counts)

**18 U.S.C. § 924(c) (brandishing,
using, and carrying a firearm during
and in relation to a crime of violence**

- 10 counts)

18 U.S.C. § 1956 (money laundering -

10 counts)

Notices of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 8, 2012, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Colonial American Bank, 300 Welsh Road, Horsham, Pennsylvania, lawful currency of the United States, that is, approximately \$49,464, belonging to, and in the care, custody, control, management and possession of Colonial American Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).



COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2012, in Horsham, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he
may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18,
United States Code, Sections 2113(a), as charged in Count One of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2012, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of First Federal Bank, 803 Park Avenue, Wrightstown, Pennsylvania, lawful currency of the United States, that is, approximately \$7,246, belonging to, and in the care, custody, control, management and possession of First Federal Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 18, 2013, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Wells Fargo Bank, 706 Stony Hill Road, Yardley, Pennsylvania, lawful currency of the United States, that is, approximately \$34,910, belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 18, 2013, in Yardley, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he
may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18,
United States Code, Sections 2113(a), as charged in Count Four of this indictment, and
brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 30, 2013, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of PNC Bank, 1015 Bethlehem Pike, Ambler, Pennsylvania, lawful currency of the United States, that is, approximately \$29,777, belonging to, and in the care, custody, control, management and possession of PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 30, 2013, in Ambler, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Six of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2013, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Harleysville Savings Bank, 1889 East Ridge Pike, Royersford, Pennsylvania, lawful currency of the United States, that is, approximately \$13,854, belonging to, and in the care, custody, control, management and possession of Harleysville Savings Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2013, in Royersford, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he
may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18,
United States Code, Sections 2113(a), as charged in Count Eight of this indictment, and
brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2013, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Univest Bank, 4285 Township Line Road, Schwenksville, Pennsylvania, lawful currency of the United States, that is, approximately \$13,365, belonging to, and in the care, custody, control, management and possession of Univest Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2013, in Schwenksville, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Ten of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2013, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Wells Fargo Bank, 25 West Skippack Pike, Ambler, Pennsylvania, lawful currency of the United States, that is, approximately \$74,337, belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2013, in Ambler, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he
may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18,
United States Code, Sections 2113(a), as charged in Count Twelve of this indictment, and
brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2014, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of First Priority Bank, 10 Sentry Parkway, Blue Bell, Pennsylvania, lawful currency of the United States, that is, approximately \$60,000, belonging to, and in the care, custody, control, management and possession of First Priority Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2014, in Blue Bell, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Fourteen of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2015, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Wells Fargo Bank, 481 West Germantown Pike, Plymouth Meeting, Pennsylvania, lawful currency of the United States, that is, approximately \$90,618, belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2015, in Plymouth Meeting, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Sixteen of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 3, 2015, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Wells Fargo Bank, 1675 Limekiln Pike, Dresher, Pennsylvania, lawful currency of the United States, that is, approximately \$89,371, belonging to, and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 3, 2015, in Dresher, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Eighteen of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2016, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly and unlawfully by force and violence, and by intimidation, took from employees of PNC Bank, 1216 Welsh Road, North Wales, Pennsylvania, lawful currency of the United States, that is, approximately \$32,744, belonging to, and in the care, custody, control, management and possession of PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2016, in North Wales, in the Eastern District of Pennsylvania,
defendant

RICHARD BOYLE

knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a), as charged in Count Twenty of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNTS TWENTY-TWO THROUGH THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Square, Inc., was a financial services company based in San Francisco, California. Square, Inc., provided its customers with the ability to accept credit and debit card payments using a mobile device. In this manner, Square, Inc., assisted many small business owners accept credit and debit cards for payment without the need for conventional credit card terminals. In exchange for its financial services, Square, Inc., charged its customers a fee based upon the amount of funds processed.
2. Defendant RICHARD BOYLE established an account at Square, Inc., for his photography business, sometimes called Sky Eye View, based out of his home in Doylestown, Pennsylvania. Between 2012 and 2016, defendant BOYLE's photography business received very little revenue and earned no profits.
3. Between 2012 and 2016, defendant RICHARD BOYLE committed a series of bank robberies as described in Counts One through Eleven. Through these bank robberies, defendant BOYLE stole approximately \$495,686 in U.S. currency.
4. In order to conceal the source of the bank robbery proceeds, defendant RICHARD BOYLE pretended that these proceeds came from his photography business. To support that ruse and pretend that his business had substantial revenue, defendant BOYLE used his own credit cards to process \$17,000 in transactions through Square, Inc., using the proceeds of the bank robberies. Square, Inc., charged defendant BOYLE a fee of \$457.50 for processing these transactions and deposited the remaining \$16,542.50 into defendant BOYLE's account.

5. On or about the dates set forth below, in the Eastern District of Pennsylvania, defendant

RICHARD BOYLE

knowingly conducted the following financial transactions affecting interstate commerce, each transaction constituting a separate count:

COUNT	DATE	DESCRIPTION
TWENTY-TWO	April 22, 2015	\$1000 transaction through Square, Inc.
TWENTY-THREE	April 27, 2015	\$1500 transaction through Square, Inc.
TWENTY-FOUR	May 4, 2015	\$1500 transaction through Square, Inc.
TWENTY-FIVE	May 16, 2015	\$500 transaction through Square, Inc.
TWENTY-SIX	June 22, 2015	\$1000 transaction through Square, Inc.
TWENTY-SEVEN	June 29, 2015	\$2500 transaction through Square, Inc.
TWENTY-EIGHT	March 9, 2016	\$1500 transaction through Square, Inc.
TWENTY-NINE	April 29, 2016	\$3000 transaction through Square, Inc.
THIRTY	May 24, 2016	\$3500 transaction through Square, Inc.
THIRTY-ONE	October, 14, 2016	\$1000 transaction through Square, Inc.

6. When conducting the financial transactions described in paragraph 5 above, defendant RICHARD BOYLE knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

7. The financial transactions described in paragraph 5 above involved the proceeds of a specified unlawful activity, that is, bank robbery, in violation of 18 U.S.C. § 2113(a), and defendant RICHARD BOYLE acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

NOTICE OF FORFEITURE No.1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2113(a) as set forth in this indictment, defendant

RICHARD BOYLE

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), both incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

NOTICE OF FORFEITURE No. 2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956 set forth in this indictment, defendant

RICHARD BOYLE

shall forfeit to the United States of America any property, real or personal, involved in such violation, and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

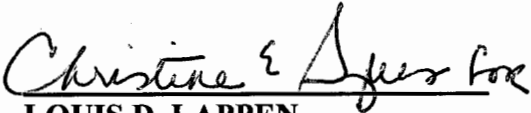
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:


LOUIS D. LAPPEN
Acting United States Attorney
